

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SPECIAL SITUATIONS FUND III QP, L.P.; :
SPECIAL SITUATIONS CAYMAN FUND, L.P.; :
COLUMBIA PACIFIC OPPORTUNITY FUND, : No. 1:13-cv-01094 (ER)
L.P.; FIR TREE VALUE MASTER FUND, L.P.; :
FIR TREE CAPITAL OPPORTUNITY MASTER :
FUND, L.P.; LAKE UNION CAPITAL FUND :
L.P.; LAKE UNION CAPITAL TE FUND L.P.; : Oral Argument Requested
ASHFORD CAPITAL MANAGEMENT, INC.; ZS :
EDU L.P.; MRMP MANAGERS LLC; WHI :
GROWTH FUND QP, LP; DOUGLAS N. :
WOODRUM; ROBERT A. HORNE; HOWARD S. :
BERL; BRIGHTLIGHT CAPITAL PARTNERS :
LP; and TORTUS CAPITAL MASTER FUND, LP, :
:
Plaintiffs, :
:
v. :
:
DELOITTE TOUCHE TOHMATSU CPA, LTD.; :
DELOITTE & TOUCHE LLP; ANTONIO SENA; :
JUSTIN TANG; YIN JIANPING; RICHARD XUE; :
MICHAEL SANTOS, JOHN AND JANE DOES 1- :
10; and ABC CORPS. 1-10, :
:
Defendants. :
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NOTICE OF MOTION FOR LEAVE TO FILE A SECOND AMENDED COMPLAINT

PLEASE TAKE NOTICE that upon the accompanying motion papers, and all the prior pleadings and proceedings in this action, Plaintiffs will move this Court, before the Honorable Edgardo Ramos, United States District Judge, at the United States Courthouse for the Southern District of New York, 40 Foley Square, New York, New York 10007, at a date and time to be determined by the Court, for leave to file a Second Amended Complaint and Jury Demand in this action, pursuant to Federal Rule of Civil Procedure 15, in the form of Exhibit A to the Declaration of Sheila A. Sadighi, submitted herewith. Plaintiffs respectfully request that oral argument be heard on this motion.

Dated: August 25, 2014
New York, New York

LOWENSTEIN SANDLER LLP

By: /s/ Lawrence M. Rolnick
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-and-

Sheila A. Sadighi (*pro hac vice*)
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